

Espersen Whistleblower System



Policy	Page 1 af 1	Languages: English
Issued by: Alex Olsen & Ole Keilberg	Date of issue: 07.04.2016	Valid for: Consumer, Fillet, EBS and Packaging
Business Approver: CEO	Valid from: date of approval	Valid in: All legal companies which are owned by Insepa A/S by more than 50%

Purpose

In Line with the Espersen Code of Conduct we encourage our employees and partners to report concerns or misconduct on a (fellow) employee or superior within our company.

Definitions

A **whistleblower** is a person who exposes any kind of information or activity that is deemed illegal, dishonest, not correct or not in accordance with our Code of Conduct.

Policy

There are some reasons to believe that people are more likely to take action with respect to unacceptable behavior, within an organization, if there are systems that offer a choice of options for absolute confidentiality.

In order to support the Espersen Code of Conduct, whistleblower protection and the very integrity of the Company, Espersen will provide a safe system, Espersen Whistleblower System, for employees and partners to report on concerns or illegal activities in the workplace.

The system is at all times a third party provided system to ensure as much creditability and faith in the system as possible.

The Espersen Whistleblower System is to be used by Espersen employees as well as external partners on reporting on concerns or illegal activities in the workplace according to Espersen Code of Conduct and our whistleblower procedure.

Responsible

The CEO appoints two administrators of the Espersen Whistleblower system. The administrators shall work independently of each other. The administrators are given the mandate to investigate and use the needed resources in order to investigate any reported cases.

The administrators is having the dialog with the whistleblower. The system administrator shall furthermore ensure action is taken based on the outcome of the investigation and work for protection of the whistleblower.